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Attorneys for the United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA)	No. 09-0862 MHP
)	
v.)	
)	STIPULATION AND [PROPOSED]
)	ORDER DOCUMENTING WAIVER
DONALD DANIELS, et al.,)	
)	
Defendants.)	
)	
)	

On September 17, 2009, defendants Donald Daniels, Martin William Washburn, and Irina Rebegeneau appeared before the Honorable Elizabeth D. Laporte for an initial appearance. On September 18, 2009, defendants Donald Daniels and Irina Rebegeneau appeared before Magistrate Judge Laporte. On that date, Magistrate Judge Laporte ordered that the parties appear before the Honorable Marilyn H. Patel on October 19, 2009, for a trial setting hearing.

On September 22, 2009, defendant Martin William Washburn appeared before the Honorable Maria Elena James for appointment of counsel. On that date, the parties requested,

1 and Magistrate Judge James ordered, that time be excluded under the Speedy Trial Act from
 2 September 22, 2009, through October 19, 2009, to allow the Government to produce discovery to
 3 the defendant and for the defendant to review discovery. With the agreement of the parties and
 4 with the consent of the defendants, the Court enters this order confirming the exclusion of time
 5 under the Speedy Trial Act from September 22, 2009 through October 19, 2009. The parties
 6 agree and stipulate, and the Court finds and holds, as follows:

7 The ends of justice served by excluding the period from September 22, 2009 through
 8 October 19, 2009 from Speedy Trial Act calculations outweighs the interests of the public and
 9 the defendant to a speedy trial, by ensuring the effective preparation of counsel, in accordance
 10 with 18 U.S.C. § 3161(h)(7)(A) and (B).

11
 12 STIPULATED:

13
 14 DATED: September 27, 2009

/s Mary McNamara
 MARY MCNAMARA, ESQ.
 Attorney for DONALD DANIELS

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 16
 17 DATED: September 28, 2009

/s Nanci Clarence
 NANCY CLARENCE, ESQ.
 Attorney for MARTIN WILLIAM WASHBURN

18
 19
 20 DATED: October 7, 2009

/s Anthony Brass
 ANTHONY BRASS, ESQ.
 Attorney for DONALD DANIELS

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 22
 23 DATED: October 8, 2009

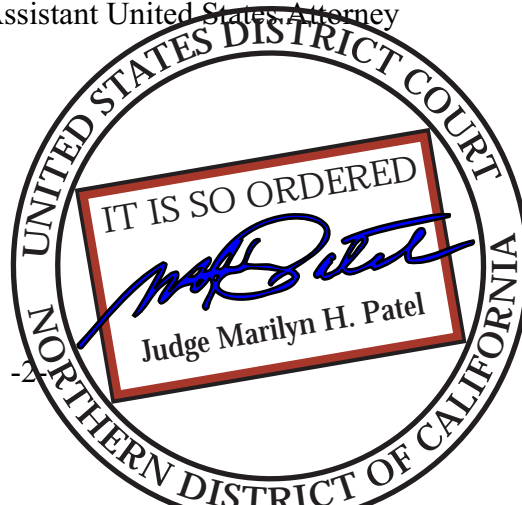
/s Christine Y. Wong
 CHRISTINE Y. WONG
 Assistant United States Attorney

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1 IT IS SO ORDERED.

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3 DATED: October 8, 2009

4 HON. MARILYN H. PATEL
United States District Judge